

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

**UNITED STATES OF AMERICA**

**v.**

**CHRISTOPHER ROCHON**

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**Case No. 3:19-CR-146-2  
Judge Thomas A. Varlan**

**MOTION TO CONTINUE TRIAL DATE**

The Accused, Mr. Christopher Rochon, by and through counsel, moves this Honorable Court pursuant to 18 U.S.C. 3161(h)(7)(A) and (B) to continue the trial and all relevant deadlines in his case. The trial in this matter currently set on May 5, 2020. The plea deadline in this matter is April 24, 2020. In support of the motion, Mr. Rochon would show the following:

1. Counsel for the accused has been involved in a good faith effort to resolve Mr. Rochon's case, but despite due diligence, additional time will be required to communicate with Mr. Rochon discuss factual issues, discuss legal issues, confer with the Government and prepare for trial.

2. Granting a continuance in this case will permit the parties the opportunity to make a full resolution of all issues pending against the accused; it will serve the ends of justice in that the need for additional time to properly prepare the case outweighs the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

3. The right to a speedy trial has been fully explained to Mr. Rochon, who is currently in custody pending trial, and he understands that the period of time between the filing of this motion for continuance and a rescheduled court date will be fully excludable for speedy trial purposes.

4. Brent N. Jones, counsel for the Government, has informed counsel that she has no opposition to the proposed continuance.

In consideration of the foregoing, counsel for the Accused respectfully requests a continuance of the trial date and all relevant deadlines.

Respectfully submitted this 21<sup>st</sup> day of April, 2020.

FEDERAL DEFENDER SERVICES  
OF EASTERN TENNESSEE, INC.

By: /s/Nakeisha C. Jackson  
Nakeisha C. Jackson  
Assistant Federal Defender  
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Certificate of Service

I HEREBY CERTIFY that on April 21, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Nakeisha C. Jackson  
Nakeisha C. Jackson  
Assistant Federal Defender